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March 4, 2019

BY ECF

The Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re:

Democratic National Committee v. The Russian Federation (WikiLeaks)

18 Civ. 3501 (JGK)

Dear Judge Koeltl:

This letter is submitted on behalf of defendant Wikileaks, which I represent in the above-entitled case, and seeks permission to file a Supplemental Memorandum of Law of ten pages (2,527 words) in support of WikiLeaks's previously filed Motion to Dismiss (ECF Dkt #s 206, 207 & 208). While the Court's initial October 3, 2018 Scheduling Order (ECF Dkt #181) did not account for combined page limits for a second round of motions to dismiss, this application is being made in an abundance of caution. Plaintiff's Second Amended Complaint does not disturb the analysis in WikiLeaks's initial Memo of Law (ECF Dkt #208), but does add some material that is addressed in the Supplemental Memo of Law. As a result, the Supplemental Memo of Law responds exclusively to specific additions in the Second Amended Complaint, and it is respectfully requested that the Court grant permission to file it as a supplement to WikiLeaks's initial motion to dismiss.

Respectfully submitted,

Joshua L. Dratel